

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROADGET BUSINESS PTE. LTD., a private
limited company organized in the country of
Singapore,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE A HERETO

Defendants.

CIVIL ACTION NO. 1:23-cv-17036

Judge: Hon. Sara L. Ellis

**DEFENDANT’S OPPOSED MOTION FOR REFERRAL
TO THE REGISTER OF COPYRIGHTS UNDER 17 U.S.C. § 411(b)(2)**

Defendant Shandong Tahai Network Technology Co., Ltd. (Defendant No. 10 on Schedule A of the Complaint) hereby moves the Court under 17 U.S.C. § 411(b)(2) to refer to the Copyright Office the false ownership claims Plaintiff knowingly made in its applications for the Swag Bear copyright registrations. In support of the Motion, Defendant submits (1) their Memorandum in support of the Motion, (2) the Declaration of Haoyi Chen and accompanying exhibits, and (3) the “[Proposed] Request to the Register of Copyrights Pursuant to 17 U.S.C. § 411(b)(2)” (which is also being submitted via email per the Court’s procedures).

The parties’ counsel met and conferred by phone call on March 5, 2024, pursuant this Court’s Motion Practice rules. Plaintiff opposes this Motion. Defendant proposes the following briefing schedule which is identical to the schedule agreed to by Plaintiff in Civil Action No. 1:23-cv-16262 pending before Judge Cummings on a similar motion:

Plaintiff's Opposition is due within two weeks of the filing of the Motion, and Defendant's Reply is due within two weeks of the filing of the Opposition.

Dated: March 5, 2024

Respectfully Submitted,

/s/ William W. Flachsbart

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Pro hac vice forthcoming